

1 Lisa McMahon-Myhran, OSB 00084
2 Robinson Tait, PS
3 710 Second Avenue, Suite 710
4 Seattle, WA 98104
5 206-676-9640

6
7 IN THE UNITED STATE DISTRICT COURT
8 FOR THE DISTRICT OF OREGON

9 JUSTIN JAMES AND NICOLE JAMES,;
10 Plaintiff,

11 vs.

12 FREMONT REORGAINZING COMPANY,
13 fka FREMONT INVESTMENT AND LOAN
14 COMPANY, a California corporation; BRIDGE
15 CAPITAL CORPORATION, a California
16 corporation; HSBC BANK USA, NA, a
17 national banking association,
18 Defendant

Case No.: CV-08-0397-BR

DECLARATION OF LISA MCMAHON-
MYHRAN IN SUPPORT OF DEFENDANT
FREMONT REORGAINZING COMPANY'S
MOTION TO EXTEND DISCOVERY AND
OTHER RELATED DEADLINES

19 I Lisa McMahon-Myhran, declare:

20 1. I am one of the attorneys for defendant Fremont Reorganizing Company in this
21 case. I have personal knowledge of the facts set forth in this declaration.

22 2. Fremont has moved the Court for an order extending all case management and
23 discovery deadlines, including the deadline for dispositive motions by 90 days.

24 3. The parties have attempted to minimize costs and conduct very limited discovery
25 while attempting settlement negotiations but settlement does not seem possible at this point and
more extensive discovery is needed.

4. This motion has been filed to allow Fremont time to complete discovery and then
proceed with its motion for summary judgment.

1 I hereby declare that the above statement is true to the best of my knowledge and belief,
2 and that I understand it is made for use as evidence in Court and is subject to penalty for perjury.
3
4

5 Dated this 28th day of September, 2009

6 /s/ Lisa McMahon-Myhran

7 Lisa McMahon-Myhran, OSB
8 00084
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25